

1-31-2012

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: 2011 Annual CPNI Certification and Accompanying Statement of **Pinnacle Telecom, LLC** EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.2009(e), **Pinnacle Telecom, LLC** hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission please contact the undersigned.

Sincerely,

A handwritten signature in blue ink that reads "Keith Gibson". The signature is fluid and cursive, with the first and last names clearly legible.

Keith Gibson
President
Pinnacle Telecom, LLC

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for: 2011

1-31-2012

Name of Company covered by this certification: Pinnacle Telecom, LLC

Form 499 Filer ID: 822972

Name of signatory: Keith Gibson

Title of signatory: President


I, Keith Gibson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. "provide explanation of any actions taken against data brokers"

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI., broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information). "provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI"

Signed: _____


Keith Gibson, President

EB Docket No. 06-36

CERTIFICATION OF CPNI FILING FOR 2010
PURSUANT TO 47 C.F.R. §64.2009(e)
Form 499 Filer ID No. 822972

1-31-2012

I certify that I am an officer of **Pinnacle Telecom, LLC** ; and I have personal knowledge that **Pinnacle Telecom, LLC** has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Keith Gibson
Officer's Printed Name

Keith Gibson
Officer's Signature

President
Title

1-31-2012
Date

**STATEMENT OF COMPLIANCE WITH THE
FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES**

Pinnacle Telecom, LLC 's operating procedures ensure that **Pinnacle Telecom, LLC** is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Pinnacle Telecom, LLC has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of **Pinnacle Telecom, LLC** that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has not taken any action against data brokers during the preceding year regarding unauthorized release of CPNI; nor has the Company received any customer complaints concerning the unauthorized access to or unauthorized disclosure of CPNI. The Company has implemented safeguard procedures to protect our customers' CPNI from pretexters including, but not limited to, the adoption and implementation of a policy for customer requests for CPNI consistent with 47 C.F.R. §64.2010.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.